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Adam Brendel, Jayson Brumfield, John Keast,
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SEAN DAVID FOLLETT,
Plaintiff,

vs.

JAMES DZURENDA, et al.,
Defendants.

Case No. 3:19-cv-00154-MMD-CLB

**MOTION TO EXTEND DEADLINE TO FILE
ANSWER TO AUGUST 25, 2020**

Defendants, Adam Brendel, Jayson Brumfield, John Keast, Kathryn Reynolds and Thomas Wyatt, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Meredith N. Beresford, Deputy Attorney General, hereby files this Motion for Extension of Deadline to File Answer to August 25, 2020. This motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Defendants respectfully request an extension of time to August 25, 2020 to file an Answer. Counsel for Defendants has already drafted portions of the Answer but Counsel for Defendants had a death in her immediate family and has been out of state. Counsel did email Plaintiff's Counsel to inform her of this request. Further, this request has been necessitated by recent quarantine measures imposed in response to the COVID-19 virus pandemic. Namely, Governor Sisolak issued a "stay at home" directive on April 1, 2020, whereby Deputy Attorneys General and other staff are required to

utilized home-based working arrangements. As a result, the already limited staff at the Office of the Attorney General is rendered less efficient due to constraints imposed by limited Virtual Private Networks (VPN) and lack of remote document access.

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows: When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

The requested extension of time should afford Defendants adequate time to finish preparing and file the Answer.

For these reasons, Defendants respectfully request a one week extension of time from the current deadline to file an Answer in this case, with a new deadline to and including Tuesday, **August 25, 2020**.

Proposed Schedule for Deadline

Answer deadline

August 25, 2020

DATED this 17th day of August, 2020.

AARON D. FORD
Attorney General

By: /s/ Meredith N. Beresford
MEREDITH N. BERESFORD, Bar No. 13308
Deputy Attorney General

Attorneys for Defendants

IT IS SO ORDERED.

Dated: August 17, 2020.


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 17th day of August, 2020, I caused to be served a copy of the foregoing, **MOTION TO EXTEND DEADLINE TO FILE ANSWER TO AUGUST 25, 2020**, by U.S. District Court CM/ECF Electronic Filing on:

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/s/ Perla M. Hernandez
An employee of the
Office of the Attorney General